

1 Brandon P. Leahy (SBN 298064)
2 **DUANE MORRIS LLP**
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5 San Francisco, CA 94105-1127
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9 Attorneys for Plaintiff
10 SCOTT SERIO

11
12 **UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **(SAN FRANCISCO DIVISION)**

15 SCOTT SERIO,

16 Plaintiff,

17 v.

18 FAN FAIR INC. d/b/a MARIN COUNTY SPORTS,

19 Defendant.

Case No.: 3:16-cv-00438-JSC

**DECLARATION OF STEVEN M.
COWLEY IN SUPPORT OF
PLAINTIFF SCOTT SERIO'S
MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT FAN FAIR
INC. D/B/A MARIN COUNTY SPORTS**

20 Date: September 1, 2016
21 Time: 9:00 a.m.
22 Courtroom: F, 15th Floor

23 Magistrate Judge: Jacqueline S. Corley
24 Complaint Filed: January 25, 2016

1 I, Steven M. Cowley, declare:

2 1. I am an attorney duly admitted to practice and in good standing in the Commonwealth
3 of Massachusetts. I am a partner with the law firm Duane Morris LLP (“Duane Morris”), and have
4 supervised the representation of Plaintiff Scott Serio (“Plaintiff”), a Duane Morris client. I am
5 responsible for reviewing and approving the charges on the case. I provide this declaration in support
6 of Plaintiff’s Motion For Default Judgment Against Defendant Fan Fair Inc. d/b/a Marin County
7 Sports (“Motion”). I have personal knowledge of the facts stated herein, and if called as a witness, I
8 could and would competently testify thereto.

9 2. Defendant Fan Fair Inc. d/b/a Marin County Sports (“Defendant”) is a corporation
10 organized under the laws of Arizona, and therefore not in U.S. military service. *See* 50 U.S.C. App.
11 § 521, *et seq.*

12 3. I graduated from Harvard Law School in 1989. I have been a practicing attorney for
13 over 26 years. My practice focuses primarily in intellectual property and complex commercial
14 litigation, including copyright litigation. My standard billing rate for 2016 is \$750 per hour,
15 although I charge a discounted rate of \$675. I have not billed any time on this contingency fee case,
16 and instead have delegated the handling of this matter to appropriate local counsel, as described in
17 paragraphs 8-10 below.

18 4. As the supervising and billing attorney, I chose appropriate Duane Morris personnel
19 to be staffed on this case. I supervised their work, without billing separately for my time. I also
20 have also been responsible for reviewing the fees incurred in our representation of Plaintiff and I am
21 fully familiar with the services that Duane Morris has performed in this matter. I have worked to
22 ensure the time spent was reasonable for the work performed.

23 5. The exhibits below, representing the costs and fees incurred by Duane Morris in this
24 representation, reference “ImageRights International, Inc.” and “Eclipse.” ImageRights
25 International, Inc. (“ImageRights”) is copyright protection service that works with the Plaintiff under
26 a services agreement to assist in the identification of unauthorized displays or other uses of digital
27 images owned by the Plaintiff. For a description of the copyright protection services performed by
28 ImageRights for its customers, see www.imagerights.com. ImageRights referred Plaintiff to Duane

1 Morris to obtain legal assistance in pursuing his copyright infringement claim that is the subject of
2 this lawsuit. “Eclipse” refers to Eclipse Sportswire, a trade name used by Plaintiff in his
3 photography business.

4 6. Attached as **Exhibit A** is a true and correct copy of a “Cost Recap Summary”
5 detailing the costs associated with Duane Morris’s representation of Plaintiff in this matter, totaling
6 \$1,557.31, mostly comprised of filing (\$400) and messenger service (\$437.21) fees. A document
7 showing all messenger service invoices to Duane Morris in this matter is attached as **Exhibit B**.
8 Attached as **Exhibit C** is a document showing all “professional service” fees incurred by Duane
9 Morris, totaling \$95.50, which were required to effect personal service on Defendant (and which is
10 included in the \$1,557.31 figure above) through the Arizona Corporation Commission.

11 7. Attached as **Exhibit D** is a true and correct copy of the attorneys’ fees incurred by
12 Duane Morris during this representation. These invoices show \$11,948.00 in attorney time spent by
13 Duane Morris in this matter through July 25, 2016, which reflects the discounted (i.e., reduced from
14 our standard rates) billing rate for all Duane Morris personnel applied to this matter.

15 8. I have read and reviewed these time entries, and based upon my careful review of
16 each entry at the time of billing, input from other team members, and the review of the invoices in
17 Exhibit D for purposes of this motion, the time entries are fair, equitable and reasonable. It is my
18 further opinion that the dollar amount attributed to each entry is fair and reasonable. I believe that
19 these time entries fairly and accurately represent the work that was done and the time that was
20 required to carry out that work, and the expenses which were actually incurred and necessary to
21 carry out this litigation. I am aware that our time entries understate the total time and value of work
22 performed on this matter, as I made the decision not to separately record my time for supervising the
23 work of the associates and paralegals who have handled this matter.

24 9. As the supervising attorney, it was my responsibility to properly staff this case with
25 the appropriate personnel. To that end, I chose Brandon Leahy as lead associate and local counsel
26 on this case because he practices in the area of intellectual property law and litigation, and is
27 conveniently located in Duane Morris’s San Francisco office. Mr. Leahy graduated from the
28 University of San Francisco School of Law in 2012, is a member of the California bar, and is

1 admitted to practice in this Court. Mr. Leahy's current hourly billing rate at Duane Morris for 2016
2 is \$400 per hour, but Mr. Leahy's time is recorded at the preferred rate of \$360 per hour for this
3 matter. It is my opinion, based on my experience and knowledge of hourly rates of other attorneys in
4 the industry, that an hourly rate of \$360 is reasonable, and is at or below the customary hourly rates
5 of attorneys with similar experience practicing in federal court.

6 10. In addition to the fees shown in Exhibit D, which shows unbilled fees from inception
7 of the representation through July 25, 2016, I anticipate that Mr. Leahy will spend four (4) hours
8 preparing for and attending the hearing for this motion on September 1, 2016, which is the
9 equivalent of \$1,440 of his professional time.

10 11. Also, as is customary in most litigation, Duane Morris staffed an experienced
11 paralegal to assist in this litigation. David Rollins, a paralegal in our firm's Atlanta office, has a
12 standard billing rate of \$315 but his time has been recorded on this matter at the firm's "preferred"
13 rate of \$285. He worked a total of two (2) hours on this case, to the cost of \$570.

14 12. I also obtained the assistance of research specialist Cate Nash, of the Philadelphia
15 office, who has a standard billing rate \$325 and a preferred rate of \$275, which was applied here.
16 She contributed .4 hours of billable time, to the cost of \$114.

17 13. Calculating the costs incurred in this representation of \$1,557.31, as shown in
18 Exhibits A, B and C, plus fees incurred in the amount of \$11,948, as shown in Exhibit D, Duane
19 Morris has incurred a total of \$13,505.31. Duane Morris also is likely to incur further fees and costs,
20 such as to attend the hearing on this motion, which it will report to the Court within 14 days of the
21 Court's order.

22 14. In my opinion, based upon my careful review of each timekeeper's time entry at the
23 time of billing, input from other team members, and the review of Exhibits A-D for purposes of this
24 motion, the contemporaneous time entries are fair, equitable and reasonable. It is my further opinion
25 that the dollar amount attributed to each entry is fair and reasonable. It is also my opinion, based
26 upon my careful review of each entry in Exhibits A-C of my declaration, and input from other team
27 members, that the dollar amount attributed to each expense entry is fair and reasonable, and that all
28 expenses were reasonable and necessarily incurred in connection with this case.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 28 th day of July, 2016, at Boston, Massachusetts.

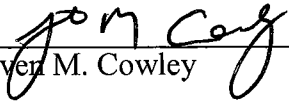
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EXHIBIT A

Cost Recap Summary by CostCode [U2994-00017 - ECLIPSE V. MARIN COUNTY]

Page 1

Client: U2994 - IMAGERIGHTS INTERNATIONAL, INC. (CONTINGENT FEE MATTERS) 7/22/2016 10:54:21 AM

CostCode	Worked Amount	Billed Amount	Description
0016	323.70	323.70	LEXIS LEGAL RESEARCH
0019	95.50	95.50	PROFESSIONAL SERVICES
0029	104.48	104.48	OVERNIGHT MAIL
0036	47.20	47.20	WESTLAW LEGAL RESEARCH
0057	30.87	30.87	COLOR PRINTING & DUPLICATING - INTERNAL
0059	6.45	6.45	PRINTING - INTERNAL
0082	400.00	400.00	FILING FEES
0086	437.21	437.21	MESSENGER SERVICE
0114	10.96	10.96	DOCUMENT RETRIEVAL
1159	100.94	100.94	COLOR PRINTING - INTERNAL
TOTAL	1557.31	1557.31	

EXHIBIT B

**WESTERN
MESSENGER**
VOTED BEST MESSENGER SERVICE
2016, Recorder Newspaper

*** REPRINT ***

INVOICE NUMBER	CUSTOMER NUMBER	INVOICE DATE	INVOICE AMOUNT
1163543	20262	1/27/16	404.44

IP ORDERING (415) 487-4100 BILLING DEPT 415-487-4277

WESTERN MESSENGER SERVICE, INC
75 Columbia Square
San Francisco, CA 94103-4015

CUSTOMER NUMBER	INVOICE NUMBER
20262	1163543
INVOICE DATE	PAGE
1/27/16	1

DUANE MORRIS LLP
ATTN: ACCOUNTS PAYABLE
1 MARKET ST SPRAR TOWER #2200
SAN FRANCISCO CA 94105-1104

INVOICE

FOR CUSTOMER SERVICES:
415-487-4100
FOR BILLING QUESTIONS:
Accounting 415-487-4277
Federal Tax I.D. #94-2598876
E-Mail ar@westernmessenger.com

DATE	CONTROL NO.	ORDERED BY: TIME CALLED	SV-TY DR#	DESCRIPTION	CHARGES
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1/26/16	3153531	BLANCA 08:19	B3H 1497	From: DUANE MORRIS LLP To: USDC 1 MARKET STREET 450 GOLDEN GATE AVENUE SAN FRANCISCO U2994-17	14.06
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Total Charges for Ref. - U2994-17: 14.06

RECEIVED

JUN 13 2016

By _____

5/13/2015 3:26 PM

6/16/2003 9:06 AM



INVOICE NUMBER	CUSTOMER NUMBER	INVOICE DATE	INVOICE AMOUNT
70247	737	3/16/16	230.90

BILLING QUESTIONS PLEASE CALL (415) 487-4140

WESTERN ATTORNEY SERVICE, INC
75 Columbia Square
San Francisco, CA 94103-4016

DUANE MORRIS LLP
ACCOUNTS PAYABLE
1 MARKET PLZ SPEAR TWR #2200
SAN FRANCISCO CA 94105-1104

INVOICE

CUSTOMER NUMBER	INVOICE NUMBER
737	70247
INVOICE DATE	PAGE
3/16/16	1

FOR CUSTOMER SERVICES:
415-487-4100
FOR BILLING QUESTIONS:
Accounting 415-487-4277
Federal Tax I.D. 994-2598678
E-Mail info@westernmessenger.com

DATE	CONTROL NO.	ORDERED BY TIME CALLED	SVC TYPE	DESCRIPTION	CHARGES
3/10/16	296512	BLANCA HERRERA 11:36	HBK 1901	From: WESTERN MESSENGER MAIN To: USDC- SAN FRANCISCO 75 COLUMBIA SQUARE 450 GOLDEN GATE AVENUE Ref: U2994-17 SAN FRANCISCO SAN FRANCISCO DELIVERY	31.90

BILLING QUESTIONS PLEASE CALL (415) 487-4140

CUSTOMER NUMBER	INVOICE NUMBER
737	70197
INVOICE DATE	PAGE
3/09/16	1

INVOICE

FOR CUSTOMER SERVICES:
415-487-4100
FOR BILLING QUESTIONS:
Accounting 415-487-4277
Federal Tax I.D. #94-2608676
E-Mail arg@westernmessenger.com

DATE	CONTROL NO.	ORDERED BY TIME CALLED	SV-TY DR#	DESCRIPTION	CHARGES
1/26/16	295767	BLANCA HERRE 11:11	OSA 999	From:DUANE MORRIS LLP To:FAN PAIR INC DBA MARIN COUNTY 1 MARKET STREET 3838 EAST PATRICK LANE Ref:U2994-17 SERVICE OF PROCESS SAN FRANCISCO PHOENIX	106.00



INVOICE NUMBER	CUSTOMER NUMBER	INVOICE DATE	INVOICE AMOUNT
70434	737	4/13/16	1,078.45

BILLING QUESTIONS PLEASE CALL (415) 467-4140

WESTERN ATTORNEY SERVICE, INC
75 Columbia Square
San Francisco, CA 94103-4016

DUANE MORRIS LLP
ACCOUNTS PAYABLE
1 MARKET PLZ SPEAR TWR #2200
SAN FRANCISCO CA 94105-1104

INVOICE

CUSTOMER NUMBER	INVOICE NUMBER
737	70434
INVOICE DATE	PAGE
4/13/16	1

FOR CUSTOMER SERVICES:
415-467-4100
FOR BILLING QUESTIONS:
Accounting 415-467-4277
Federal Tax 15, 994-2598676
E-Mail ar@westernmessenger.com

DATE	CONTROL NO.	ORDERED BY TIME CALLED	SV-TY DR#	DESCRIPTION	CHARGES
3/02/16	296365	BLANCA HERRE 15:02	OSA 999	From: DUANE MORRIS LLP 1 MARKET STREET SAN FRANCISCO To: PAN FAIR INC C/P JEFFREY C KRA 25 PHAETONS DRIVE MELVILLE Ref: U2994-17 SERVICE OF PROCESS	234.00
<div style="border: 1px solid black; padding: 10px; transform: rotate(-5deg); margin-top: 20px;"> <p><i>PS</i> NO RECORD OF PAYMENT IN ACCOUNTING</p> <p>ORIGINAL ORDER RECEIVED IN ACCOUNTING</p> <p>VERIFIED BY</p> <p>APPROVED FOR PAYMENT</p> </div>					



INVOICE NUMBER	CUSTOMER NUMBER	INVOICE DATE	INVOICE AMOUNT
70760	737	5/25/16	1,373.79

BILLING QUESTIONS PLEASE CALL (415) 487-4140

RECEIVED

JUN 13 2016

WESTERN ATTORNEY SERVICE, INC
75 Columbia Square
San Francisco, CA 94103-4015

CUSTOMER NUMBER	INVOICE NUMBER
737	70760
INVOICE DATE	PAGE
5/25/16	1

By _____
DUANE MORRIS LLP
ACCOUNTS PAYABLE
1 MARKET PLZ SPEAR TWR #2200
SAN FRANCISCO CA 94105-1104

INVOICE

FOR CUSTOMER SERVICES:
415-487-4100
FOR BILLING QUESTIONS:
Accounting 415-487-4277
Federal Tax I.D. #04-2588676
E-Mail ar@westernattorneysanger.com

DATE	CONTROL NO.	ORDERED BY TIME CALLED	SV-TY DB/	DESCRIPTION	CHARGES
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5/23/16	297920	BLANCA 11:02	HRK 1942	From: WESTERN ATTORNEY SERVICES To: USDC- SAN FRANCISCO 75 COLUMBIA SQUARE 450 GOLDEN GATE AVENUE Ref: U2994-17 DELIVERY SAN FRANCISCO SAN FRANCISCO Pages: 13	34.50
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EXHIBIT C

1022365

201710

**REQUEST FOR CHECK
CHARGED TO CASES**

\$ \$25.00 * Date 03/28/2016

Payee Arizona Corporation Commission

Client/Matter Name: SERIO vs. FAN FAIR, INC.

FILE No.: U 2 9 9 4 - 0 0 0 1 7
(Client) (Matter)

CODE (See Reverse Side)	* Narrative Description to Appear on Bill
** 0019	Fee for Arizona Corporation Commission
	to serve Fan Fair Inc by mail

Practice Group TRIAL

Timekeeper No. 0 7 5 4 2

Payment will be made within three (3) business days the approved check request is received by the Accounts Payable Department.

Brandon Leahy

Name (please print)

Signature (requested by)

*Requests below \$750
require Attorney Approval

Attorney Approval

*Requests \$750 and above
require Approval by
Practice Group Head

Practice Group Head Approval

RETURN CHECK TO:

FOR ACCOUNTING USE ONLY

CHECK # DATE PAID

DMADMIN\3357.1

5/13/2015 3:26 PM

1026/22

REQUEST FOR CHECK
CHARGED TO CASES

\$ \$5.50 * Date 03/28/2016

Payee Arizona Corporation Commission

Client/Matter Name: SERIO vs. FAN FAIR, INC.

FILE No.: U 2 9 9 4 - 0 0 0 1 7
(Client) (Matter)

CODE (See Reverse Side)	* Narrative Description to Appear on Bill
** 0019	Fee for Arizona Corporation Commission
	to prepare Certified Certificate of Mailing
	on service of Summons & Complaint on
	Fan Fair Inc

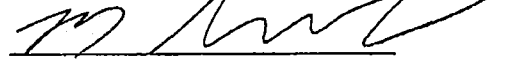
Practice Group TRIAL

Timekeeper No. 0 7 5 4 2

Payment will be made within three (3) business days the approved check request is received by the Accounts Payable Department.

Brandon Leahy

Name (please print)



Signature (requested by)

*Requests below \$750
require Attorney Approval

Attorney Approval

*Requests \$750 and above
require Approval by
Practice Group Head

Practice Group Head Approval

RETURN CHECK TO: _____

FOR ACCOUNTING USE ONLY

CHECK # 1579 DATE PAID _____

DMADMIN3357.1

5/13/2015 3:26 PM

2017/10

1026155

REQUEST FOR CHECK
CHARGED TO CASES

\$ \$25.00 * Date 04/05/2016

Payee ACC, 1300 West Washington St., 1st Flr, Phoenix AZ 85007

Client/Matter Name: SERIO v. FAN FAIR, INC.

FILE No.: 02994-00017
(Client) (Matter)

CODE (See Reverse Side)	* Narrative Description to Appear on Bill
** 0019	Fee for ACC reserving by Mail Fan Fair Inc.
	with Summons, Complaint and other
	supporting documents

Practice Group TRIAL

Timekeeper No. 0 7 5 4 2

Payment will be made within three (3) business days the approved check request is received by the Accounts Payable Department.

Brandon Leahy

Name (please print)



Signature (requested by)

*Requests below \$750
require Attorney Approval

Attorney Approval

*Requests \$750 and above
require Approval by
Practice Group Head

Practice Group Head Approval

RETURN CHECK TO: _____

FOR ACCOUNTING USE ONLY

CHECK # 1592

DATE PAID _____

DMADMIN3357.1

5/13/2015 3:26 PM

1026158

REQUEST FOR CHECK
CHARGED TO CASES

\$ \$40.00 * Date 04/05/2016

Payee ACC, 1300 West Washington St., 1st Flr, Phoenix AZ 85007

Client/Matter Name: SERIO v. FAN FAIR, INC.

FILE No.: U 2 9 9 4 - 0 0 0 1 7
(Client) (Matter)

CODE (See Reverse Side)

** 0019

* Narrative Description to Appear on Bill

ACC Fee to obtain an expedited Certified
Certificate of Mailing on Fan Fair, Inc.

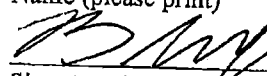
Practice Group TRIAL

Timekeeper No. 0 7 5 4 2

Payment will be made within three (3) business days the approved check request is received by the Accounts Payable Department.

Brandon Leahy

Name (please print)


Signature (requested by)*Requests below \$750
require Attorney Approval

Attorney Approval

*Requests \$750 and above
require Approval by
Practice Group Head

Practice Group Head Approval

RETURN CHECK TO: _____

FOR ACCOUNTING USE ONLY

CHECK # 1593

DATE PAID _____

DMADMIN3357.1

5/13/2015 3:26 PM

201710

EXHIBIT D

DUANE MORRIS LLP
U2994-00017 - IMAGERIGHTS INTERNATIONAL, INC. (CONTINGENT FEE MATTERS) / ECLIPSE V. MARIN COUNTY
UNBILLED FEES - INCEPTION TO DATE
Run on 7/25/16

Date	Name	Details	Hours	Value
1/24/2016	BRANDON LEAHY	REVIEW EMAILS FROM S COWLEY AND C HAINES REGARDING COPYRIGHT LAWSUIT TO BE FILED IN NORTHERN DISTRICT	0.2	\$72.00
1/25/2016	BRANDON LEAHY	CONFER WITH AND ASSIST B HERRERA IN FILING COMPLAINT	1.1	\$396.00
1/25/2016	BRANDON LEAHY	REVIEW AND RESPOND TO EMAIL FROM S COWLEY REGARDING SERVING DEFENDANT	0.1	\$36.00
1/25/2016	BRANDON LEAHY	REVIEW COMPLAINT AND EXHIBITS AND PREPARE FOR FILING	0.7	\$252.00
1/26/2016	BRANDON LEAHY	CONFER AND EXCHANGE EMAILS WITH B HERRERA REGARDING SERVING DEFENDANT WITH COMPLAINT AND SUMMONS AND COORDINATING CALENDARING WITH ATTORNEYS FROM OTHER OFFICES	0.3	\$108.00
1/26/2016	BRANDON LEAHY	RESEARCH LOCAL RULES REGARDING COPYRIGHT OFFICE NOTICE FORM FOR INITIATION OF LAWSUIT AND RESPOND TO S COWLEY EMAIL ON SAME SUBJECT	0.4	\$144.00
1/27/2016	BRANDON LEAHY	REVIEW EMAIL FROM S COWLEY REGARDING NEED TO AMEND COMPLAINT AND COMMUNICATE WITH B HERRERA REGARDING SAME	0.3	\$108.00
2/16/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING INABILITY TO SERVE DEFENDANTS AND FORWARD EMAIL REGARDING SAME TO S COWLEY	0.1	\$36.00
2/16/2016	BRANDON LEAHY	REVIEW EMAIL FROM D ROLLINS AND S COWLEY CONCERNING SERVICE OF DEFENDANT	0.1	\$36.00
2/16/2016	DAVID J. ROLLINS	RESEARCHING INFORMATION ON MARIN COUNTY SPORTS. SUMMARIZING MY FINDINGS FOR STEVEN COWLEY.	0.5	\$142.50
2/17/2016	CATE NASH	RESEARCH CONCERNING FINDER ON PAUL KRANZ FOR DROLLINS	0.4	\$110.00
2/18/2016	BRANDON LEAHY	EXCHANGE EMAILS AND CONFER WITH B HERRERA REGARDING HOW TO EFFECT PROPER SERVICE	0.4	\$144.00
2/18/2016	BRANDON LEAHY	EXCHANGE EMAILS WITH S COWLEY REGARDING SERVICE OF PROCESS	0.1	\$36.00
2/18/2016	BRANDON LEAHY	REVIEW SEARCH REPORT FOR PURPOSE OF SERVING DEFENDANT	0.1	\$36.00
2/18/2016	DAVID J. ROLLINS	RESEARCHING A MORE CURRENT ADDRESS FOR JEFF KRANZ. REVIEWING SKIP-TRACING REPORT PREPARED BY LIBRARY. PREPARING A SUMMARY OF THE INFORMATION FROM THAT REPORT FOR STEVEN COWLEY'S REVIEW.	0.9	\$256.50
2/19/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING PROCESS OF SERVICE	0.1	\$36.00
3/2/2016	BRANDON LEAHY	EXCHANGE EMAILS WITH S COWLEY REGARDING USE OF A MAGISTRATE AND SERVICE OF PROCESS AND CONFER ON SAME WITH B HERRERA	0.1	\$36.00
3/2/2016	BRANDON LEAHY	RECEIVE EMAIL FROM C HAINES REGARDING MAGISTRATE AND CONSIDER OPTION OF USING A MAGISTRATE	0.2	\$72.00
3/3/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING SERVICE ATTEMPTS AND COST AND COMMUNICATE SAME BY EMAIL TO S COWLEY	0.2	\$72.00
3/4/2016	BRANDON LEAHY	CHECK WITH B HERRERA REGARDING SERVICE ATTEMPTS ON DEFENDANT	0.1	\$36.00
3/7/2016	BRANDON LEAHY	COMPLETE AND FILE CONSENT OR DECLINATION FORM	0.1	\$36.00
3/7/2016	BRANDON LEAHY	EXCHANGE EMAILS WITH COURT CLERK CONCERNING CONSENT OR DECLINATION OF MAGISTRATE AND INFORM S COWLEY AND C HAINES	0.2	\$72.00
3/9/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING FILING OF NOTICE OF CONSENT TO MAGISTRATE JUDGE	0.1	\$36.00
3/14/2016	BRANDON LEAHY	PHONE CALL WITH S COWLEY REGARDING ALTERNATIVE SERVICE OF DEFENDANT BY EMAIL AND REQUEST FOR EXPEDITED DISCOVERY	0.1	\$36.00
3/14/2016	BRANDON LEAHY	REVIEW EMAIL FROM S COWLEY CONCERNING FILING FOR ALTERNATE FORM OF SERVICE OF DEFENDANT	0.1	\$36.00
3/14/2016	BRANDON LEAHY	REVIEW EMAIL FROM S COWLEY CONTAINING EXAMPLE OF MOTION FOR ALTERNATIVE SERVICE IN FEDERAL COURT	0.3	\$108.00

DUANE MORRIS LLP
U2994-00017 - IMAGERIGHTS INTERNATIONAL, INC. (CONTINGENT FEE MATTERS) / ECLIPSE V. MARIN COUNTY
UNBILLED FEES - INCEPTION TO DATE
Run on 7/25/16

Date	Name	Details	Hours	Value
3/14/2016	BRANDON LEAHY	SEEK EXAMPLE OF MOTION FOR ALTERNATIVE SERVICE IN FEDERAL COURT BY WAY OF EMAIL TO CALIFORNIA ASSOCIATES	0.1	\$36.00
3/21/2016	BRANDON LEAHY	PREPARE MOTION FOR LEAVE TO MAKE ALTERNATIVE SERVICE AND THIRD-PARTY SUBPOENA OF EBAY	1.6	\$576.00
3/23/2016	BRANDON LEAHY	CALL WITH S COWLEY REGARDING SERVICE OF PROCESS ISSUE	0.1	\$36.00
3/23/2016	BRANDON LEAHY	LISTEN TO VOICE MESSAGE FROM S COWLEY REGARDING SERVICE OF PROCESS PROBLEMS AND REVIEW MY EMAIL TO HIM ON SAME TWO DAYS AGO	0.2	\$72.00
3/23/2016	BRANDON LEAHY	REVIEW AGENTS SERVICE OF PROCESS AFFIDAVITS REGARDING ATTEMPTS MADE AND FIND OUT WHETHER WE CAN SERVE AS SECRETARY OF STATE	0.9	\$324.00
3/28/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING EFFECTUATING PROPER SERVICE VIA ARIZONA AGENCY AND INFORM S COWLEY OF STATUS REGARDING SAME VIA EMAIL	0.3	\$108.00
3/28/2016	BRANDON LEAHY	REVIEW SERVICE REQUIREMENTS FOR SERVICE OF PROCESS VIA THE ARIZONA CORPORATION COMMISSION AND EMAIL B HERRERA TO FOLLOW-UP	0.2	\$72.00
3/31/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING HER CONVERSATION WITH COURT CLERK AS TO CONTINUANCE OF DEADLINES	0.1	\$36.00
3/31/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING OBTAINING CERTIFICATE OF SERVICE AND FINDING OUT HOW TO DEAL WITH INITIAL CASE DEADLINES	0.1	\$36.00
3/31/2016	BRANDON LEAHY	REVIEW UPCOMING INITIAL DEADLINES	0.1	\$36.00
3/31/2016	BRANDON LEAHY	SEARCH LOCAL NORTHERN DISTRICT RULES FOR DEALING WITH INITIAL DISCLOSURES AND OTHER DEADLINES WHEN DEFENDANT CANNOT BE LOCATED	0.1	\$36.00
4/4/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING PROOF OF SERVICE AND FILING OF REQUEST FOR CONTINUANCE OF INITIAL DATES AND CMC	0.2	\$72.00
4/4/2016	BRANDON LEAHY	EMAIL S COWLEY WITH UPDATE ON PROOF OF SERVICE AND REQUEST FOR CONTINUANCE	0.2	\$72.00
4/5/2016	BRANDON LEAHY	DRAFT REQUEST FOR CONTINUANCE OF INITIAL TRIAL DATES	2.7	\$972.00
4/6/2016	BRANDON LEAHY	REVIEW REQUEST FOR CONTINUANCE OF INITIAL CMC AND PREPARE FOR FILING	0.2	\$72.00
4/14/2016	BRANDON LEAHY	CONFER WITH B HERRERA REGARDING OBTAINING PROOF OF SERVICE FROM ARIZONA CORP COMMISSION	0.1	\$36.00
4/18/2016	BRANDON LEAHY	RECEIVE CERTIFICATE OF MAILING OF SERVICE OF COMPLAINT AND SUMMONS AND CONFER WITH B HERRERA ON FILING WITH THE COURT	0.2	\$72.00
5/13/2016	BRANDON LEAHY	CHECK STATUS OF CASE AND PLAN ON SEEKING DEFAULT JUDGMENT IF NOTHING NEXT WEEK	0.1	\$36.00
5/17/2016	BRANDON LEAHY	CONSIDER NEXT STEPS IN LIGHT OF DEFENDANTS LACK OF ANSWER TO COMPLAINT AND CORRESPOND RE SAME WITH S COWLEY AND D ROLLINS THEN RESEARCH WHETHER WE NEED TO FILE A FORMAL REQUEST FOR ENTRY OF DEFAULT JUDGMENT	0.9	\$324.00
5/17/2016	BRANDON LEAHY	DISCUSS PROCEDURE FOR SEEKING DEFAULT JUDGMENT IN THE NORTHERN DISTRICT OF CALIFORNIA WITH L CASE AND CONDUCT INDEPENDENT RESEARCH	0.3	\$108.00
5/18/2016	BRANDON LEAHY	REVIEW EMAIL FROM D ROLLINS REGARDING EBAY WEBSITE. CONDUCT MY OWN RESEARCH OF THE SITE, AND EMAIL S COWLEY ON SAME	0.3	\$108.00
5/18/2016	DAVID J. ROLLINS	RESEARCHING MARINCOUNTYS SPORTS AND FAN FAIR, INC. TO SEE IF THEY WERE STILL OPERATING AND IF THEY HAD STARTED SELLING THE INFRINGING IMAGE AGAIN. ALSO RESEARCHING NEW POSSIBLE CONTACTS. PREPARING A SUMMARY OF MY FINDINGS FOR BRANDON LEAHY'S REVIEW.	0.6	\$171.00
5/19/2016	BRANDON LEAHY	PHONE CALL WITH S COWLEY TO DISCUSS FILING ENTRY OF DEFAULT AND ADR FORMS	0.1	\$36.00
5/19/2016	BRANDON LEAHY	PREPARE FOR FILING REQUIRED ADR FORMS AND ENTRY OF DEFAULT AND COMMUNICATE RE SAME WITH S COWLEY	0.8	\$288.00

DUANE MORRIS LLP
U2994-00017 - IMAGERIGHTS INTERNATIONAL, INC. (CONTINGENT FEE MATTERS) / ECLIPSE V. MARIN COUNTY
UNBILLED FEES - INCEPTION TO DATE
Run on 7/25/16

<u>Date</u>	<u>Name</u>	<u>Details</u>	<u>Hours</u>	<u>Value</u>
5/19/2016	BRANDON LEAHY	WRITE MESSAGE VIA EBAY TO DEFENDANT INFORMING HIM OF COMPLAINT AND SEEKING RESPONSE	0.4	\$144.00
5/20/2016	BRANDON LEAHY	COORDINATE FILING OF CLERK'S DEFAULT AND ACCOMPANYING DECLARATION WITH B HERRERA	0.3	\$108.00
5/20/2016	BRANDON LEAHY	DRAFT CLERK'S DEFAULT REQUEST AND DECLARATION AND DOUBLE CHECK PROPER PROCEDURE	1.1	\$396.00
5/25/2016	BRANDON LEAHY	FILE ADR FORMS	0.2	\$72.00
6/6/2016	BRANDON LEAHY	PREPARE AND FILE WITH ASSISTANCE FROM B HERRERA REQUEST TO CANCEL CASE MANAGEMENT CONFERENCE IN LIGHT OF DEFENDANT'S DEFAULT	0.3	\$108.00
6/6/2016	BRANDON LEAHY	REVIEW EMAIL FROM COURT CLERK CONCERNING SCHEDULED CMC AND EXCHANGE EMAILS ON SAME WITH S COWLEY AND CLERK TO DETERMINE HOW TO CANCEL CMC IN LIGHT OF DEFENDANT'S DEFAULT AND COMMUNICATE RE SAME WITH B HERRERA	0.4	\$144.00
6/7/2016	BRANDON LEAHY	REVIEW EXEMPLAR OF DEFAULT JUDGMENT MOTION FROM CHRIS YEH	0.3	\$108.00
6/7/2016	BRANDON LEAHY	PREPARE ORDER VACATING CMC AND SEEK EXEMPLARS FROM COLLEAGUES OF MOTION FOR DEFAULT JUDGMENT	0.1	\$36.00
6/24/2016	BRANDON LEAHY	CORRESPOND WITH S COWLEY REGARDING STATUS OF MOTION FOR DEFAULT JUDGMENT	0.1	\$36.00
6/27/2016	BRANDON LEAHY	FOLLOW UP WITH S COWLEY RE MOTION FOR DEFAULT JUDGMENT	0.1	\$36.00
7/7/2016	BRANDON LEAHY	CHECK STATUS AND CORRESPOND WITH S COWLEY	0.1	\$36.00
7/11/2016	BRANDON LEAHY	PREPARE MOTION FOR DEFAULT JUDGMENT	0.6	\$216.00
7/12/2016	BRANDON LEAHY	PREPARE MOTION FOR DEFAULT JUDGMENT	0.6	\$216.00
7/14/2016	BRANDON LEAHY	PREPARE MOTION FOR DEFAULT JUDGMENT	0.5	\$180.00
7/15/2016	BRANDON LEAHY	PREPARE MOTION FOR DEFAULT JUDGMENT	0.8	\$288.00
7/18/2016	BRANDON LEAHY	DISCUSS WITH B HERRERA SCHEDULING OF HEARING ON MOTION FOR DEFAULT JUDGMENT AND TAKING OF CMC OFF CALENDAR	0.2	\$72.00
7/18/2016	BRANDON LEAHY	DRAFT MOTION FOR DEFAULT JUDGMENT MPA	0.8	\$288.00
7/20/2016	BRANDON LEAHY	DRAFT MOTION FOR DEFAULT JUDGMENT MPA	0.8	\$288.00
7/21/2016	BRANDON LEAHY	COORDINATE WITH B HERRERA OBTAINING RECORDS AND CALCULATING OUR FEES AND COSTS IN THIS MATTER	0.2	\$72.00
7/21/2016	BRANDON LEAHY	DRAFT DECLARATION AND NOTICE OF MOTION FOR MOTION FOR DEFAULT JUDGMENT	0.4	\$144.00
7/21/2016	BRANDON LEAHY	DRAFT MOTION FOR DEFAULT JUDGMENT MPA	2.6	\$936.00
7/21/2016	BRANDON LEAHY	SEEK AND SECURE HEARING DATE FOR MOTION AND GET CMC TAKEN OFF CALENDAR	0.3	\$108.00
7/22/2016	BRANDON LEAHY	CORRESPOND WITH S COWLEY AND STAFF REGARDING PREPARATION OF DECLARATIONS SUPPORTING MOTION FOR DEFAULT JUDGMENT	0.3	\$108.00
7/22/2016	BRANDON LEAHY	DRAFT DECLARATION FROM S COWLEY AND CLIENT TO BE FILED IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT	4.2	\$1,512.00
7/25/2016	BRANDON LEAHY	OBTAIN UPDATED TIME ENTRY REPORT FOR INCLUSION IN DECLARATION	0.2	\$72.00
TOTALS			33.7	\$11,948.00